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August 17, 1999

Docket Management Branch,  
Food and Drug Administration  
12420 Parklawn Drive, Rm. 1-23  
Rockville, MD 20857

7181 '99 AUG 24 A10:10  
Re: Docket 98-0203/CP

I am writing in reference to the above docket which has been referred to in a petition submitted to your office from United Poultry Concerns. I understand it is in reference to the use of Forced Molting by the egg production industry.

Obviously, forced molting is a practice which is used to increase egg production. But it is also just one more instance of an industry that, while benefiting from a cruel practice, is content to exposing the public to the unnecessary hazard of Salmonella. I assume you are aware of the debeaking, the narrow cages and the feeding of products whose sources could turn the stomach of anyone privy to the ingredients.

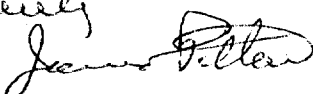
As you know, Salmonella enteritidis is showing up in eggs and the primary egg pathogen is transmitted directly from a hen to her egg. In the words of the FDA itself, "the ideal solution to this public health problem would be to adopt measures to eliminate viable Se in shell eggs." We can all say "Amen" to that but the question becomes, "What measures?" One that immediately steps forward is the forced molting of the chickens which results in such stress it weakens the hen's immune system so badly she becomes prone to disease and salmonella infections.

Forced molting is an inhumane process. The frightened birds are deprived of food for up to two weeks, water is restricted for up to eight weeks and they are kept in pitch dark for weeks on end. The result is that hundreds of them die while those who survive grow weak, shed all their feathers and lose up to 35% of their body weight. And all of this cruelty throws the hens' systems into collapse, stressing and shocking their worn-out bodies into laying one more batch of eggs before being sent to slaughter.

Is it any wonder that salmonella is so prevalent among chicken eggs and carcasses. It has been stated that unmolted hens usually have to ingest about 50,000 Salmonella cells to become infected. Molted hens need fewer than ten to become infected. The result is sick birds and contaminated eggs.

Warning labels and refrigeration are not enough. If the public is to be properly protected, the problem must be addressed at the source which is the egg farms that are forcing molting to make a few extra dollars. Public safety should come before greed and forced molting should be prohibited by law.

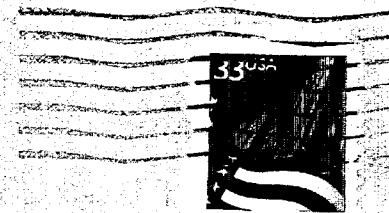
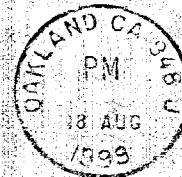
As a member of the egg eating public, I appeal to you to provide me with the protection that can come from outlawing forced molting.

Sincerely,  


98P-0203

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